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March 30, 2015

VIA ECF

Hon. Vincent L Briccetti
United States District Court, S.D.N.Y.
300 Quarropas St.
White Plains, NY 10601-4150

Re: Aglonu v. Peter T. Roach & Associates, P.C., et al.
Index: 14-cv-8399
Our File: 40230

Your Honor:

This office represents Plaintiff in the above-captioned action, in which Defendant Einstein & Associates, P.C. ("SEA") recently filed a reply in further support of its motion to dismiss.¹

SEA's reply submission contains previously undisclosed purported audio recordings of the parties, previously undisclosed purported screenshots from SEA's computer systems, and three new supporting affidavits (in addition to a reply memorandum).

Plaintiff and her counsel are currently in the process of reviewing these new materials.

In light of the nature of SEA's reply submission, Plaintiff requests until April 7th to review SEA's submission, and determine the most appropriate course of action, with the undersigned to inform and update the Court (and seek leave for any additional filing to the extent required under the rules) at that time.

Respectfully,
s/Daniel A. Schlanger
Daniel A. Schlanger

cc: M. Manniello, Esq.
A. Poulin, Esq.

¹ SEA seeks to convert its motion to one for summary judgment pursuant to Fed. R. Civ. P. 12(d). The reasons mitigating against SEA's request under the relevant precedent were previously set forth in Plaintiff's Omnibus Memorandum Of Law In Opposition To All Defendants' Motions To Dismiss (*ECF Doc. 30*), pp. 27-29.